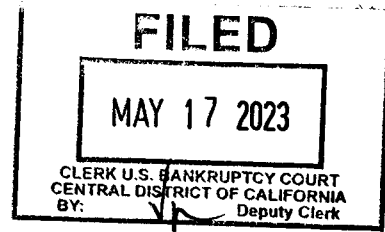


1 Alicia Marie Richards  
2 Santa Ana Jail, M-88  
3 Alicia Richards, 2300000041  
4 Post Office Box 22003  
5 Santa Ana, California 92702  
6 No email/ no phone  
7 Unrepresented Debtor



8  
9 UNITED STATES BANKRUPTCY COURT  
10  
11 CENTRAL DISTRICT OF CALIFORNIA, SANTA ANA DIVISION  
12

13 IN RE: ) CHAPTER 7  
14 )  
15 ALICIA MARIE RICHARDS, ) Case No. 8:21-bk-10635-SC  
16 )  
17 ) NOTICE OF MOTION AND MOTION TO  
18 ) REMOVE RICHARD A. MARSHACK,  
19 Debtor. ) CHAPTER 7 TRUSTEE FOR CAUSE  
20 ) PURSUANT TO 11 U.S.C. § 324  
21 )  
22 )  
23 ) Hearing Date: June 6, 2023  
24 ) Time: 11:00 a.m.  
25 ) Place: Courtroom TBD 411 W. Fourth Street  
26 ) Santa Ana, CA 92701  
27 ) Via Zoomgov  
28 )

19 TO THE HONORABLE BANKRUPTCY JUDGE, RICHARD A. MARSHACK, CHAPTER 7  
20 TRUSTEE, UNITED STATES TRUSTEE, AND TO ALL INTERESTED PARTIES:  
21

22 PLEASE TAKE NOTICE that on June 6, 2023 at 11:00 a.m. or as soon  
23 thereafter as the matter may be heard in Courtroom TBD located at 411 Fourth Street, Santa Ana,  
24 CA 92701 via zoomgov audio and/or telephone appearance with permission, Alicia Marie Richards  
25 (“Debtor”), of the bankruptcy estate (the “Estate”) of Alicia Marie Richards, will and hereby does move  
26 the Bankruptcy Court to remove Richard A. Marshack, Chapter 7 Trustee for cause on the grounds set  
27 forth under 11 U.S.C. §324.  
28

1 This motion will be based on this notice of motion, notice that the hearing will be held by  
2 Zoomgov audio and video and/or with telephone approval, the memorandum of points and authorities,  
3 Declaration of Alicia Marie Richards served and filed herewith and Exhibits attached thereto, on the  
4 papers and records on file herein and on such oral and documentary evidence as may be presented at  
5 the hearing on the motion.

6 If you object to this Motion, pursuant to Rule 9013-1 of the Local Bankruptcy  
7 Rules ("LBR"), any opposition must be filed with the court no later than fourteen (14) days prior to  
8 the date of the hearing on the Motion. You must file your opposition with the Clerk of the United  
9 States Bankruptcy Court. You must also serve a copy of your objection upon Debtor Alicia Marie  
10 Richards no later than fourteen (14) days prior to the date of the hearing plus 3 for mailing on the  
11 Motion at the mailing address indicated in the upper left corner of the first page of this motion. You  
12 must also serve your opposition upon the Office of the United States Trustee at 411 West Fourth Street,  
13 Suite 7160, Santa Ana, CA 92701.  
14

15 Any failure to timely file and serve an opposition may result in a waiver of any such opposition  
16 and the court may enter an order granting the motion without further notice.  
17

18 Dated: 5/10, 2023

By: 

Alicia Marie Richards

## MEMORANDUM OF POINTS AND AUTHORITIES

### I. PRELIMINARY STATEMENT AND BACKGROUND

Debtor brings this motion for Removal of Richard A Marshack, Chapter 7 Trustee for cause under 11 U.S.C. § 324(a) because of his conflict of interest in investigating and determining whether to pursue possible claims against himself and his law firm and his agent Richard Heston arising from the performance of their duties in the course of the bankruptcy proceedings.

### II. FACTUAL AND PROCEDURAL BACKGROUND

Debtor commenced this Chapter 7 bankruptcy proceeding on March 12, 2021. Richard A. Marshack was appointed as Chapter 7 trustee of Debtor's bankruptcy estate ("Estate").

### III. SUMMARY OF ARGUMENT

Richard A. Marshack has failed to investigate and prosecute certain claims on behalf of the bankruptcy estate, and has a conflict of interest in investigating and pursuant these claims against himself and his law firm and his agents. In particular, Richard A. Marshack has failed to pursue a claim arising from his gross negligence by not determining property interest and jurisdiction before selling non-estate property; claims arising from Richard A. Marshack's failure to investigate the void dissolution judgment that was obtained by fraud on the court by a judicial officer Kevin E. Robinson and Kevin E. Robinson's false attorney fee claim filed in the bankruptcy court for \$206,000 based on a fraudulent dissolution of divorce judgment; in addition to numerous other claims warranting investigation by a neutral and disinterested trustee that include claims arising from Richard A. Marshack and his attorney's collusion with Ryal W. Richards, Kevin E. Robinson, Andrew Brown, Ellie Britt and Lucian Rusu. See list of potential estate claims arising post-petition, *infra*.

In this matter, the bankruptcy estate had potential claims against Richard A. Marshack and his law firm, including his agents and Richard A. Marshack is subject to removal as trustee because he has a conflict of interest in investigating, evaluating, and pursuing these possible claims. There is cause for

1 a breach of fiduciary duty claim against Richard A. Marshack that remains viable and worthy of  
2 investigation, as do several possible claims of malpractice against Richard A. Marshack's law firm and  
3 Richard Heston's law firm and the estate has a right to have those claims investigated further and  
4 evaluated by a disinterested trustee (emphasis added) on behalf of the bankruptcy estate, which  
5 necessarily entails the removal of Richard A. Marshack as trustee.

#### 6 **IV. ARGUMENT**

##### 7 **A. The Bankruptcy Court has authority to Remove Marshack under 11 U.S.C. § 324(a)** 8 **for cause.**

9 The Bankruptcy Court can exercise its authority under 11 U.S.C. § 324(a) to remove a trustee  
10 "for cause." "Removal of a trustee under § 324 is left to the sound discretion of the bankruptcy court."  
11 *Dye v. Brown (In re AFI Holding, Inc.)*, 530 F. 3d 832, 844 (9<sup>th</sup> Cir. 2008). A bankruptcy court will be  
12 deemed to have abused this discretion only "where the reviewing court has a definite and firm  
13 conviction that the court below committed a clear error of judgment." See *PCFS Financial v. Spragin*  
14 *(In re Nowak)*, 586 F. 3d 450, 454 (6<sup>th</sup> Cir. 2009) (internal quotations marks and citations omitted).  
15 "The question is not how the reviewing court would have ruled, but rather whether a reasonable person  
16 could agree with the bankruptcy court's decision. . ." *In re Nowak*, 586 F. 3d at 454 (internal quotation  
17 marks and citation omitted).  
18  
19

20 In this matter, it is clear there is a conflict of interest with Richard A. Marshack in investigating  
21 and pursuing potential estate claims against himself and his law firm and his agents arising from their  
22 conduct in the course of Debtor's bankruptcy proceeding. This Court should invoke 11 U.S.C. §  
23 324(a), which authorizes a bankruptcy court, "after notice and a hearing," to "remove a trustee . . . for  
24 cause." As the courts have observed, "the Bankruptcy Code does not define 'cause,'" leaving it to the  
25 bankruptcy courts to "make the determination on a case by case basis." See *Boyd v. Rabin (In re*  
26 *Boyd)*, 397 B.R. 544, 2008 WL 4372948, at \*3 (B.A.P. 6<sup>th</sup> Cir. Sept. 23, 2008); See also *In re AFI*  
27 *Holding*, 530 F. 3d at 845. "Typical cause for removal includes incompetence, misconduct in office,  
28

1 conflict of interest, or other violations of fiduciary duties the trustee owes to the estate and its  
2 creditors.” In re *Boyd*, 2008 WL 4372948, at \*3 (internal quotation marks and citations omitted); *see*  
3 *also In re AFI Holding*, 530 F.3d at 845 (“It is well established that ‘cause’ may include trustee  
4 incompetence, violation of the trustee’s fiduciary duties, or lack of disinterestedness or holding an  
5 interest adverse to the estate.”). In this matter, Debtor is identifying potential claims arising from  
6 allegations of malpractice and breach of fiduciary duties and these claims should be pursued and  
7 investigated. Richard A. Marshack has a conflict of interest in investigating these claims and deciding  
8 whether to pursue these claims on behalf of the estate. These potential claims against himself and  
9 claims against his own law firm and his agents arising from Richard A. Marshack’s mishandling,  
10 misconduct, and violations of fiduciary duty of Debtor’s bankruptcy estate for example are:

- 12 1. Claim arising from the sale of the real property located at 351 Catalina Drive, N.B., CA  
13 92663;
- 14 2. Claims arising from the turnover of the real property;
- 15 3. Claims arising from actions taken in the family law court and transfers without court  
16 authority to Ryal W. Richards;
- 17 4. Claims arising from the settlement agreement with Andrew Brown and Ellie Britt;
- 18 5. Claims arising from failing to timely object to claims
- 19 6. Failing to act impartial
- 20 7. Claims arising from agreements made with Lucian Rusu
- 21 8. Claims arising from taking an interest in real property adverse to the estate
- 22 9. Claims arising from fraud and actual injury to Debtor’s interests.
- 23 10. Failing to Investigate agents and firms exorbitant fees

24 Based on these circumstances, Marshack has engaged in conduct that give rise to potential  
25 claims of the bankruptcy estate and because of his conflict of interest, he should be removed for cause  
26 under 324.

27 As to the timeliness of a breach of fiduciary duty claim against Richard A. Marshack arising from  
28 his conduct in the bankruptcy case, the applicable three-year statute of limitations is still viable, *see*  
Cal. Code Civ. Proc. § 343 plus the new Trustee can allege tolling since the claims have been ongoing  
and continuous.

1  
2 The potential claim against Richard A. Marshack did not accrue until the bankruptcy estate  
3 suffered harm as a result of Richard A. Marshack's alleged breach. This harm arose from the  
4 November 4, 2021 sale of non-estate property and subsequent events that occurred by not knowing the  
5 Marshal procedures, failing to timely evict Debtor out of her residence, acting as agent for Kevin E.  
6 Robinson, Ryal W. Richards, Andrew Brown and Ellie, Britt, Lucian Rusu, acting impartially by  
7 instructing the family law court to close briefing on the homestead issue (See Exhibit A), failing to  
8 collect back support, and making compromises that are not in good faith and fair dealing. Judge  
9 Lafferty valued Debtor's claims to be over \$1,600,000 and Richard Marshack has not pursued any of  
10 Debtor's claims. A breach of fiduciary duty claim accrues when a plaintiff is harmed rather than when  
11 the defendant acted. Debtor's estate has been harmed. In California, "the statute of limitations for  
12 breach of fiduciary duty is three years or four years, depending on whether the breach is fraudulent or  
13 nonfraudulent." See *American Master Lease LLC v. Idanta Partners, Ltd.* (2014) 225 Cal.App.4th  
14 1451, 1479; accord, *Fuller v. First Franklin Financial Corp.* (2013) 216 Cal.App.4th 955, 963  
15 ["limitations period is three years . . . for a cause of action for breach of fiduciary duty where the  
16 gravamen of the claim is deceit, rather than the catchall four-year limitations period that would  
17 otherwise apply"].) Alternatively, where the asserted breach of fiduciary duty effectively "amount[s] to  
18 a claim of professional negligence," there is the applicable two-year statute of limitations for  
19 professional negligence. See *American Master Lease LLC*, at p. 1479; accord, *Hydro-Mill Co., Inc. v.*  
20 *Hayward, Tilton & Rolapp Ins. Associates, Inc.* (2004) 115 Cal.App.4th 1145, 1159 (*Hydro-Mill*)  
21 [where "the complaint shows that the allegations of professional negligence subsume all of the  
22 allegations for breach of fiduciary duty," the defendant "cannot prolong the limitations period by  
23 invoking a fiduciary theory of liability"].) Therefore, the claims are still viable.

24  
25  
26  
27 As a result of Richard A. Marshack's ("Marshack") appointment as trustee in this Chapter 7  
28 case, his conduct as trustee is subject to and governed by a broad body of law that includes:

- a. the explicit statutory duties outlined in § 721; and
- b. a host of common law fiduciary duties;
- c. duties, directives and obligations in the US Trustee Handbook for Chapter 7 Trustees.

These duties, directives and obligations include but are not limited to: the duties of loyalty, distribution maximization, diligence, due care, accountability, competence, claims review, information disclosure, candor, civility, proper litigation preparation and conduct, impartiality and its appearance, enforcement, supervision, compliance, and good faith and fair dealing. It also includes duties owed to secured creditors, priority creditors and the debtor, as well as post-closing obligations. In carrying out these fiduciary duties, however, a trustee is not an agent of the creditors and they have no power to direct the trustee's activities. (underlining and emphasis added).

#### **A. Richard A. Marshack has Breached his Statutory Duties as a Trustee to The Bankruptcy Estate**

Marshack has either intentionally breached and/or negligently failed to fulfill, numerous statutory and fiduciary duties in this case. In fact, the Chapter 7 Trustee instead of being personally involved in carrying out the trustee's duties and other fiduciary responsibilities, the Trustee in this case has relied "SOLELY" on his hired agents to churn the bankruptcy estate for his own firm's benefit. The Chapter 7 Trustee and his agents have taken an interest in the bankruptcy estate adverse to the bankruptcy estate in direct conflict with 28 U.S.C. § 586(a). Richard A. Marshack has failed to investigate that breach of fiduciary duty.

#### **B. Marshack Does not Qualify for Panel Membership**

Marshack does not qualify for panel membership because he does not possess integrity or good moral character. See 28 C.F.R. § 58.3(b). Marshack has refused to be accessible to Debtor and in fact failed to investigate her claims by stating they are not in complete sentences. See

1 compromise made with Ryal W. Richards. Marshack is not free of prejudices against Debtor and  
2 that has interfered with his performance of his duties as trustee.

3 **C. Marshack has a Conflict of Interest Because the Estate has a Causes of Action Against the**  
4 **Trustee for Breach of Fiduciary Duty and Malpractice**

5 The estate has potential causes of action against the trustee and the trustee's firm or other agent  
6 with whom the trustee has a business relationship. In addition to the claims listed above, other claims  
7 include but are not limited to:

- 8 a. Claims arising from Trustee's agent Richard Heston's advice to not file a motion for  
9 reconsideration of the order granting the real estate agent to sell non-estate property which  
10 advice was adverse to my estate and he gave me that advice because of his personal interest  
11 in selling the property for financial gain.
- 12 b. Claims arising from Trustee and his agents' failure to remove Debtor out of the Property  
13 before Lucian Rusu's loan expired and not knowing proper Marshal Procedure.
- 14 c. Claims arising from Trustee's failure to investigate Lucian Rusu's breach of contract; abuse  
15 of process claim when Lucian Rusu threatened my estate with legal process and fraud claims  
16 relating to the sale of the Property.
- 17 d. Claims arising from Trustee's payment to invalid creditors; not objecting to Robinson and  
18 Ryal W. Richards' duplicative claim and instead prolonging the administration to allow  
19 Ryal and Robinson to obtain an order in the family law court that is not based on fact or law  
20 and to compromise with Ryal Richards and Kevin E. Robinson based on the invalid order  
21 for payment of attorney fees and costs based on a prevailing party clause that does not exist  
22 in the signed Stipulated Judgment of June 16, 2017.
- 23 e. Claims arising from Trustee's actions with Kevin E. Robinson by giving him advice adverse  
24 to my estate. Litigating for Ryal W. Richards and Kevin E. Robinson and doing legal  
25 research on their behalf.  
26  
27  
28



- 1 f. Claims arising from Trustee's failure to collect spousal support and child support and paying  
2 Ryal W. Richards who is insolvent and Debtor will not be able to collect which was one of  
3 the reasons she filed an abstract of support judgment against his settlement of \$450,000 on  
4 the property. Trustee paid Ryal W. Richards \$600,000 which was \$150,000 more than what  
5 was agreed and did not take out any back owed support.
- 6 g. Claims arising from Trustee's enforcement of the void judgment that Judge De La Cruz  
7 allowed Debtor's motion to vacate the void judgment and make it conform to the signed  
8 Stipulation proceed because it had merit.
- 9 h. Claims arising from Trustee not looking into the discrepancies in the schedules that ran up  
10 the litigation costs.
- 11 i. Failing his duty of due care, impartiality, good faith and fair dealing and attempting to sell  
12 on behalf of the estate non-estate property.
- 13 j. Failing to include Debtor in compromises to expose her risk which shows lack of duty of  
14 care, impartiality, good faith and fair dealing.
- 15 k. The trustee compromised items that are not property of the estate and compromised  
16 fraudulent claims. Those fraudulent claims are Britt and Brown who converted Debtor's  
17 property, falsely filed a claim for goods never paid for and never received after soliciting  
18 from third parties.
- 19 l. Failing to disclose conflict of interests with his firm and the bankruptcy judge so as to obtain  
20 favors and beneficial rulings not on the merits and adverse to the estate.
- 21 m. More than any other act of this trustee, the attempt to compromise without any legal or  
22 factual basis for doing so, clearly illustrates the lack of care, competence, reckless and  
23 cavalier administration of this estate, bias and lack of impartiality this trustee has exhibited  
24 in the administration of this estate.
- 25  
26  
27  
28

///

**D. Marshack Failed his Duty to Verify that Debtor was Eligible for Chapter 7 Relief**

Trustee failed to verify Debtor was eligible for Chapter 7 Relief when she had little to no debt and in fact all the debt has arose post-petition because of Richard A. Marshack, Chapter 7 Trustee's breach of fiduciary duty.

**E. Marshack Failed his duty for reviewing sufficiency of Schedules filed by Debtor and Raising Questions where conflicts occurred**

The trustee is responsible for reviewing . . . sufficiency of the documents filed by the debtor. When Debtor filed Chapter 7, her schedules where in complete because she was not sure how to list Ryal W. Richards Separate claim and the title dispute. He further did not review the attachment to Debtor's A/B schedule that specifically listed the void judgment was on appeal and did not conform to the actual signed stipulated judgment of June 16, 2017.

**F. Marshack Administered the Estate Where the Proceeds of Liquidation Primarily Benefitted the Trustee and his professionals**

The Chapter 7 case must be administered to maximize and expedite dividends. If the sale was property of the estate, which it was not, Richard A. Marshack "shall" not administer an estate or an asset in an estate where the proceeds of liquidation will primarily benefit the trustee or the professionals, or unduly delay the resolution of the case. Richard A. Marshack was to be guided by this fundamental principle when acting as trustee. Trustee failed to generate to make a meaningful distribution before administering a case as an asset case. 28 U.S.C. § 586.

**G. Marshack Failed his Duty by Giving Advice To Creditors resulting in the perception that the Trustee is a judge or has Judicial power in violation of 28 U.S.C. § 586.**

During the 341 meeting and numerous other times as evidenced in the billing statements obtained from Richard A. Marshack's agents, the trustee was to not give legal advice to debtor or creditors such as Kevin E. Robinson and Ryal W. Richards, Ellie Britt and Andrew Brown or Lucian

Rusu, and he was to avoid actions which would result in the perception that the trustee is a judge or has judicial powers. 28 U.S.C. § 586. Richard A. Marshack has acted as judge with the dispute over Ellie Britt and Andrew Brown by giving them advice resulting in the perception that he was the judge and had judicial powers adverse to Debtor's bankruptcy estate. Richard A. Marshack has been litigating on the behalf of the creditors in violation of his duty to be impartial. Richard Heston gave legal advice to Debtor and instructed her not to file a motion for reconsideration of the real estate agent and that advice was adverse to Debtor's bankruptcy estate resulting in a breach of fiduciary duty and legal malpractice.

**H. Marshack failed his statutory duty to examine proofs of claims and object to the allowance of any claim that is improper and instead attacked valid claims.**

If a purpose would be served, examine proofs of claims and object to the allowance of any claim that is improper. 11 U.S.C. § 704(a)(5). Instead of objecting to invalid proof of claims, Richard A. Marshack objected to valid proof of claims. Claims that were not in dispute.

**I. Marshack failed his statutory duty to furnish information concerning the Estate upon request**

Debtor has requested an accounting numerous times and Richard A. Marshack, refuses to provide an accounting. Richard A. Marshack failed to provide notice to Ryal W. Richards of his support obligation and failed to collect that support obligation and instead he compromised to pay Ryal W. Richards money out of the estate knowing he is behind in support payments and could dissipate those funds and become insolvent leaving Debtor no way to collect her "secured" abstract of support judgment in the amount of \$327,000 against Ryal's agreed sum of \$450,000 per the signed contract.

- Statutory duty to Provide the applicable notice to the holder of a domestic support obligation. 11 U.S.C. § 704(a)(10)

The chapter 7 trustee is the representative of the estate. 11 U.S.C. § 323(a). The trustee is a fiduciary charged with protecting the interests of all estate beneficiaries – namely, all classes of creditors, including those holding secured, administrative, priority, and non-priority unsecured claims, as well as

1 the debtor's interest in exemptions and in any possible surplus property. The duties enumerated under  
2 section 704 are specific, but not exhaustive. Trustee has breached his fiduciary duty toward Debtor's  
3 estate and he should be removed and a new Trustee assigned to investigate these allegations.

4 If the trustee decides to sell property free and clear of liens, the trustee must determine the  
5 identity of the lien holders and give them notice of the proposed sale. The notice must tell them how  
6 much, if anything, they are to receive from the sale. 11 U.S.C. § 704, 28 U.S.C. § 586. Richard A.  
7 Marshack did not provide lien holders with notice and specifically notify them what they were to  
8 receive from the sale. Instead, he colluded with creditors and intentionally deprived Debtor of her back  
9 support against Ryal W. Richards, kept the bankruptcy case open to Kevin Robinson could get an  
10 invalid judgment not based on fact or law and now Debtor had to go appeal, and intentionally caused  
11 the litigation to continue over the turnover to intentionally cause Debtor to lose her discharge so she  
12 could not use the partial homestead and then paid the other ½ of the homestead to Ryal W. Richards  
13 who had not lived in the property for over four years and was not entitled to a homestead per the  
14 contract.  
15

16  
17 Unless the court orders otherwise, furnish such information concerning the estate and the  
18 estate's administration as is requested by a party in interest. 11 U.S.C. § 704(a)(7). There was no such  
19 information furnished in this matter.

20 Supervision of professionals is critical. The Trustee is supposed to oversee the work performed  
21 by professionals and exercises appropriate business judgment on all key decisions. The trustee must  
22 actively supervise estate professionals to ensure prompt and appropriate execution of duties,  
23 compliance with required procedures and reasonable and necessary fees and expenses. 28 U.S.C. § 586,  
24 28 C.F.R. § 58.6(a) (7). The trustee is advised to pay particular attention to the activities of  
25 professionals who are not closely regulated by state authorities or who take physical possession of  
26 estate property and funds, such as auctioneers, liquidators, brokers, collection agents and property  
27 managers. The general standards for supervising auctioneers (see Handbook Chapter 4.C.10.g) apply  
28

1 equally to other professionals who take possession of estate funds and property. Richard A. Marshack  
2 in this matter did not supervise his professional who ran amuck. In fact, Richard A. Marshack told me  
3 that the only person authorized to speak on his behalf was D. Edward Hays. Other unauthorized agents  
4 were allowed to run up huge bills unsupervised.

5 **WHEREFORE**, debtor respectfully requests that the Court enter an Order:

- 6 a. removing the trustee from this case; and/or  
7  
8 b. for such other and further relief as may be just and equitable.

9 Respectfully submitted,

10  
11 Dated: May 11, 2023

12 By



Alicia Marie Richards  
In Pro Se

DECLARATION OF ALICIA MARIE RICHARDS

I, Alicia Marie Richards declare that:

1. If called as a witness I could and would competently testify to the following facts of my own personal knowledge.

2. I have read my motion for removal of the Chapter 7 Trustee, Richard A. Marshack, and all the facts stated herein are true and correct.

3. On September 12, 2022, Richard A. Marshack accompanied by D. Edward Hays through zoomgov appeared in my family law case without telling me they were going to appear while the case had been removed to the bankruptcy court. Richard A. Marshack asked Sheila Reico to pay Ryal W. Richards my homestead money and D. Edward Hays told Judge Sheila Reico to close briefing so that when and if the case was remanded I would not be able to file an opposition. I was never notified that a hearing on September 12, 2022 at 8:30 a.m. was going to take place over the jurisdictional stay. Because of these improper and impartial actions made by Richard A. Marshack and D. Edward Hays, I had to file another appeal in the state court.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and the exhibits attached hereto are true and correct exhibits without further foundation. Executed this May 11 day of May, 2023.

  
ALICIA MARIE RICHARDS

## Certificate of Service

I caused to be served by the Santa Ana Jail whose address is post office Box 22003, Santa Ana, California, 92702, the foregoing document titled:

Notice of Motion and Motion to Remove Richard A. Marshack, Ch. 7 Trustee for Cause Pursuant to 11 USC 324

To be served by the clerk of the court on the day of receipt to the following email addresses:

chays@marshackhays.com  
tmang@marshackhays.com  
bboice@lawyer.com  
rmarshack@ig7technology.com  
ustpregron16.sae.cfa@usdoj.gov  
robinsonlawoffice@yahoo.com

I declare under penalty of perjury that the foregoing is true and correct.  
Dated 5/11/23

  
Alicia Richards

certified mail / Return Receipt No  
7022 2410 0002 6217 8491